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August 1, 2025

**VIA ECF**

The Honorable Jennifer E. Willis, U.S.M.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 425  
New York, New York 10007

Re: **JOINT LETTER REGARDING FURTHER SETTLEMENT CONFERENCE**

*Brockmole, et al. v. EZ Festivals LLC, et al.*  
*Avchukov, et al. v. Avant Gardner, LLC, et al.*  
*Palie, et al. v. EZ Festivals LLC, et al.*  
*Ting, et al. v. Avant Gardner LLC, et al.*  
Case No. 1:23-cv-08106-VM (Consolidated)

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Dear Judge Willis:

Our firm represents Defendants EZ Festivals LLC, Avant Gardner LLC, Made Event LLC, Jurgen Bildstein, CityFox, Reynard Productions, and AGDP Holding, Inc. in the above four putative class action lawsuits. Together with counsel for all Plaintiffs, we write pursuant to the Court's July 14, 2025 Order (ECF No. 138) regarding the parties' intention for further settlement conferencing with Your Honor.

As the parties continue to discuss among themselves a possible framework for resolution of these matters, **we do not seek another judicially assisted settlement conference at this time.** We all sincerely appreciate the time and investment the Court has offered thus far—which we all believe has progressed the discussion in this case.

We thank the Court for its continued help in this matter.

Respectfully submitted,

KAUFMAN DOLOWICH LLP

/s/ Patrick M. Kennell

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